

**SEALED**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**FILED**

**MAY 15 2019**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY W. W. W.  
DEPUTY CLERK

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Defendants**

**FRANKIE MARTINEZ (1),  
ROBERT TYRONE WILLIAMS (2),  
ADAM MCGARITY (3),  
BRANDY NELSON (4),  
OSSIE LAVELLE FIELDS (5),  
JOEL MARTINEZ (6), and  
JENNIFER GARZA (7),**

**Defendants.**

CRIMINAL NO:  
**SA 19 CR 0369**  
INDICTMENT **XR**

[COUNT 1: 21 U.S.C. §§ 846, 841(a)(1), 841(b) - Conspiracy to Possess with Intent to Distribute 500 grams or more of a detectable quantity of methamphetamine, and 5 kilograms or more of Cocaine;

**COUNTS 2, 3 & 4:** 21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2 - Possession with Intent to Distribute a detectable quantity of Cocaine & Aiding and Abetting;

**COUNT 5:** 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B) and 18 U.S.C. § 2 - Possession with Intent to Distribute 500 grams or more of a detectable quantity of Cocaine & Aiding and Abetting;

**COUNT 6:** 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A) and 18 U.S.C. § 2 - Possession with Intent to Distribute 500 grams or more of a detectable quantity of Methamphetamine & Aiding and Abetting.]

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[21 U.S.C. §§ 846, 841(a)(1) & 841(b)]**

That beginning on or about September, 2017, and continuing to on or about May, 2019 in the Western District of Texas, Defendants,

**FRANKIE MARTINEZ (1),  
ROBERT TYRONE WILLIAMS (2),  
ADAM MCGARITY (3),  
BRANDY NELSON (4),  
OSSIE LAVELLE FIELDS (5),  
JOEL MARTINEZ (6), and**

**JENNIFER GARZA (7),**

knowingly, intentionally and unlawfully combined, conspired, confederated and agreed together and with other, and with others, to commit the following offenses against the United States: possession with the intent to distribute controlled substances, which offenses involved Methamphetamine, a Schedule II Controlled Substance, and Cocaine, a Schedule II Controlled Substance in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b).

**QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY**

The quantity of the mixture or substance containing a detectable amount of a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
<b>FRANKIE MARTINEZ (1),</b>	500 grams or more of a mixture or substance containing a detectable quantity of Methamphetamine and 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine.
<b>ROBERT TYRONE WILLIAMS (2),</b>	5 kilograms or more of a mixture or substance containing a detectable amount of cocaine.
<b>ADAM MCGARITY (3),</b>	500 grams or more of a mixture or substance containing a detectable quantity of Methamphetamine.
<b>BRANDY NELSON (4),</b>	A Mixture or Substance Containing a Detectable Quantity of Cocaine.
<b>OSSIE LAVELLE FIELDS (5),</b>	A Mixture or Substance Containing a Detectable Quantity of Cocaine.
<b>JOEL MARTINEZ (6),</b>	500 grams or more of a Mixture or Substance a Containing Detectable Quantity of Cocaine.
<b>JENNIFER GARZA, (7),</b>	500 grams or more of a Mixture or Substance a Containing Detectable Quantity of Cocaine.

**COUNT TWO**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]**

That on or about October 2, 2018, in the Western District of Texas, Defendants,

**FRANKIE MARTINEZ (1), and  
ROBERT TYRONE WILLIAMS (2),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a Mixture or Substance Containing a Detectable Quantity of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code Section 2.

**COUNT THREE**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2 ]**

That on or about November 30, 2018, in the Western District of Texas, Defendants,

**FRANKIE MARTINEZ (1), and  
ROBERT TYRONE WILLIAMS (2),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a Mixture or Substance Containing a Detectable Quantity of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code Section 2.

**COUNT FOUR**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2 ]**

That on or about January 2, 2019, in the Western District of Texas, Defendants,

**ROBERT TYRONE WILLIAMS (2),  
BRANDY NELSON (4), and  
OSSIE LAVELLE FIELDS (5),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a Mixture or Substance Containing a Detectable Quantity of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code Section 2.

**COUNT FIVE**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) and 18 U.S.C. § 2 ]**

That on or about January 10, 2019, in the Western District of Texas, Defendants,

**ROBERT TYRONE WILLIAMS (2),  
JOEL MARTINEZ (6), and  
JENNIFER GARZA (7),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 500 grams or more of a Mixture or Substance a Containing Detectable Quantity of Cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18 United States Code Section 2.

**COUNT SIX**

**[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2 ]**

That on or about January 15, 2019, in the Western District of Texas, Defendants,

**FRANKIE MARTINEZ (1), and  
ADAM MCGARITY (3),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved which offense involved 500 grams or more of a Mixture or Substance Containing a Detectable Quantity of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections

841(a)(1) and 841(b)(1)(A) , and Title 18 United States Code Section 2.

A TRUE BILL.

[REDACTED]

FOREPERSON OF GRAND JURY

JOHN F. BASH  
United States Attorney

By: *Sam L Ponder*

SAM L. PONDER  
Assistant United States Attorney